

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	
	:	
v.	:	<b>Criminal No. 16-30 Erie</b>
	:	
<b>RICK WEAVER BUICK GMC, INC.</b>	:	
<b>ADAM JAMES WEAVER</b>	:	
<b>DOUGLAS ALAN GROOMS</b>	:	
<b>ADAM BRAYTON COOVER</b>	:	

**RESPONSE OF DEFENDANT ADAM JAMES WEAVER TO THE  
GOVERNMENT’S MOTION IN LIMINE REGARDING  
ANTICIPATED DEFENSE EXPERT TESTIMONY**

**AND NOW**, comes the Defendant, ADAM JAMES WEAVER, by and through his counsel, DAVID G. RIDGE, ESQUIRE, and files the following Response to the government’s Motion in Limine Regarding Anticipated Defense Expert Testimony, stating as follow:

**I.     Response**

1.       On October 3, 2017, the Government filed a Motion in Limine requesting an Order that would prohibit the defense expert (Jay Goldman) from offering any testimony or opinion about the defendant’s intent, mental state or mental condition.

2.       On September 13, 2017, the defense provided the U.S. Attorney’s office with a specific summary of the expected testimony of Jay Goldman. Mr. Goldman will be utilizing his background in financial and transactions involving automobile loans from both the perspective of the lending institution and the auto dealerships, and will also testify as to all of the documentation he has reviewed in preparation for his testimony as to the actual profit/loss to Rick Weaver Buick for each of the vehicles named in the Superseding Indictment.

3.       The Government was also advised that the defendant will offer Jay Goldman’s

testimony that it is not in the financial interest of a dealership and/or principle owner to obtain loans for a customer which the dealership and/or principle owner knows are likely to go into default. A loan which does go into default does have a detrimental and financial impact upon the dealership and/or principle owner, with regard to the actual profit on a vehicle and the negative impact it can have upon the dealer's relationship with the lending institution.

4. Therefore, Mr. Goldman will not be offering any type of specific opinion as to the defendant's state of mind or criminal intent.

Respectfully submitted,

**THE RIDGE LAW OFFICE**

BY: s/David G. Ridge, Esquire  
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Attorney for the Defendant, Adam Weaver

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**Criminal No. 16-30 Erie**

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing Response of Defendant, Adam Weaver, to Government's Motion in Limine Regarding Anticipated Defense Expert Testimony was served this date via email upon the following individuals, in accordance with Rules of this Court:

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Attorney for Defendant, Adam Weaver

Dated: October 10, 2017